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Attorneys for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NAVAJO HEALTH FOUNDATION – SAGE
 MEMORIAL HOSPITAL, INC. (doing
 business as “Sage Memorial Hospital”); an
 Arizona non-profit corporation,

Plaintiff,

v.

RAZAGHI DEVELOPMENT COMPANY,
 LLC; a Nevada limited liability company
 (doing business as “Razaghi Healthcare”), et
 al.,

Defendants.

Case No. 2:19-cv-00329-GMN-EJY

**JOINT STIPULATION TO EXTEND
 TIME FOR OBJECTIONS TO REPORT
 AND RECOMMENDATION [ECF No.
 117]**

(First Request)

IT IS HEREBY STIPULATED AND AGREED that Defendants shall have a two-week
 extension of time, up to and including **February 12, 2021**, to submit their objection, if any,
 pursuant to Local Rule IB 3-2 and FRCP 72(b)(2) to the Magistrate’s Order and Report and
 Recommendations at ECF No. 117. The parties have so stipulated due to defense counsel’s current
 case load, which includes multiple prescheduled depositions and other dispositive motion briefing

1 due within the original fourteen-day objection period. The additional time requested herein will
 2 permit counsel for Defendants to meet other pre-set case commitments and sufficient time address
 3 any objections to the Magistrate's Order and Report and Recommendations. This request is made
 4 in good faith and not for the purpose of delay. Neither party will be prejudiced by the requested
 5 extension, and the parties acknowledge that if approved by the Court, this extension will not
 6 constitute a waiver of any right to object under Local Rule IB 3-2 or FRCP 72(b)(2). This is the
 7 first request to extend this deadline.

8
 9 RESPECTFULLY SUBMITTED this 22 day of January 2021.

10 FISHER & PHILLIPS LLP

PAUL PADDA LAW, PLLC

11 By /s/ Kris Leonhardt
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 16 *Attorneys for Defendants*

By /s/ Paul Padda (with permission)
 Paul S. Padda, Esq.
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17 IT IS SO ORDERED:

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 20 UNITED STATES MAGISTRATE JUDGE

21 Dated: January 25, 2021
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